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***Attorney for Defendants Messner Reeves LLP  
and Torben Welch***

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

TACSIS APC, a California corporation; and KENT  
LIMSON, an individual,

Plaintiffs,

v.

JACKIE ROBINSON, an individual; ALL NET  
LAND DEVELOPMENT, LLC, a Nevada Limited  
Liability Company; ALL NET, LLC, a Nevada  
Limited Liability Company; DRIBBLE DUNK,  
LLC, a Nevada Limited Liability Company; AGS  
ASSURETY, LLC, a Nevada Limited Liability  
Company; TIMOTHY J. ARELLANO, an  
individual; DAVID LOWDEN, an individual;  
MESSNER REEVES LLP, a Colorado Limited  
Liability Partnership; TORBEN WELCH, an  
individual; LORING JACOBS, an individual, and  
DOES 1 THROUGH 100 INCLUSIVE,

Defendants.

Case No.: 2:24-cv-02284-APG-EJY

**STIPULATION TO EXTEND TIME  
TO RESPOND TO PLAINTIFFS'  
FIRST AMENDED COMPLAINT  
[ECF No. 97] (First Request)**

Plaintiffs, Tacsis APC and Kent Limson (collectively hereinafter, "Plaintiffs"), and  
Defendants, Jackie Robinson; All Net, LLC; Dribble Dunk, LLC; Loring Jacobs; All Net Land  
Development, LLC; David Lowden; Messner Reeves LLP; and Torben Welch (collectively

hereinafter, “Defendants”), stipulate to an extension of time for Defendants to respond to Plaintiffs’ First Amended Complaint. ECF No. 97.

1. Plaintiffs filed their First Amended Complaint on September 2, 2025. Pursuant to Fed. R. Civ. P. 15(a)(3) and 6(a)(1), Defendant Welch must answer or otherwise respond to the Complaint on or before September 16, 2025.

2. The parties stipulate to an extension of time up to and including October 7, 2025, for all Defendants to answer, move, or otherwise respond to Plaintiffs’ First Amended Complaint.

3. The First Amended Complaint contains new allegations and a new claim under state law. The allegations are complex and will require additional time for counsel to investigate the underlying facts and develop an understanding of the claims and possible defenses. The requested extension will not prejudice any party. The parties are not delaying the conclusion of this matter by way of trial or otherwise; no trial date has yet been ordered.

4. This is the first stipulation for extension of time to respond to Plaintiffs’ First Amended Complaint.

Dated this 12<sup>th</sup> day of September 2025,

TAC SIS LAW APC

KAEMPFER CROWELL

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/s/ Kristopher J. Kalkowski

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**ORDER**

IT IS SO ORDERED:



ELAYNA J. YOUCHAK  
United States Magistrate Judge

DATED: September 12, 2025